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10 *Counsel for Defendant*  
11 GOOGLE LLC

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15  
16 JILL LEOVY, NICHOLAS GUILAK, ) CASE NO.: 3:23-cv-03440-AMO  
17 CAROLINA BARCOS, PAUL MARTIN, )  
18 MARILYN COUSART, ALESSANDRO DE LA )  
TORRE, VLADISLAV VASSILEV, JANE )  
DASCALOS, and minor G.R., individually, and )  
on behalf of all other similarly situated, )  
19 )  
Plaintiffs, )  
20 )  
v. )  
21 GOOGLE LLC, )  
22 )  
Defendant. )  
23 \_\_\_\_\_)

DEclaration of ERIC P.  
Tuttle re Stipulation to  
Set Briefing Schedule for  
Defendant's Anticipated  
Motion to Dismiss First  
Amended Complaint

Judge: Hon. Araceli Martínez-Olguín

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1 I, Eric P. Tuttle, declare as follows:

2 1. I am an attorney and a partner at the law firm of Wilson Sonsini Goodrich &  
3 Rosati, P.C., counsel for Defendant in this matter. I submit this declaration in support of the  
4 parties' Stipulation to Continue Case Management Conference and Authorize Briefs in Excess of  
5 Default Page Limits (the "Stipulation"). I have personal knowledge of the facts set forth herein  
6 and, if called as a witness, I could and would testify competently thereto.

7 2. The Parties previously stipulated to continue the Case Management Conference  
8 and related deadlines from October 26, 2023 to November 30, 2023 (ECF No. 22), which was  
9 so-ordered by the Court (ECF No. 23).

10 3. After Plaintiffs elected to file an amended complaint in lieu of opposing  
11 Defendants' motion to dismiss the original complaint and requested until January 5, 2024 to file  
12 the amended complaint, the Parties stipulated to further continue the Case Management  
13 Conference and related deadlines to February 22, 2024 (ECF No. 26), which was so-ordered by  
14 the Court (ECF No. 27.)

15 4. Since that stipulation, Plaintiffs filed a First Amended Complaint with 12 causes  
16 of action, adding four new causes action and three new plaintiffs.

17 5. Defendant believes it would be more efficient and orderly for the Case  
18 Management Conference to take place after the hearing on the motion to dismiss when the  
19 Parties anticipate there will be greater clarity concerning the scope of the case. In addition,  
20 David Kramer, lead counsel for defendant Google now has another hearing scheduled on the  
21 morning of February 22, 2024, the date previously set for the Case Management Conference.

22 6. No schedule for the case has been set, so the requested continuance would not  
23 affect the case schedule.

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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed on January 31, 2024 at Seattle, Washington.

3 /s/ Eric P. Tuttle  
4 Eric P. Tuttle  
5 eric.tuttle@wsgr.com  
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*Counsel for Defendant*

## **SIGNATURE ATTESTATION**

2 I, David H. Kramer, am the ECF User whose ID and password are being used to file this  
3 document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence  
4 in the filing of this document has been obtained from the other signatory.

By: /s/ David H. Kramer  
David H. Kramer